

Christopher Reese

July 7, 2006
Federal Trade Commission

Dear Sir or Madam:

I am writing to express my concerns with the FTC's proposed Business Opportunity Rule R511993.

I became a Herbalife Distributor in 1997 after 20 years as a small business owner. When the economy died so did my business. Herbalife has given me and my family not only the health and vitality they are so famous for. The opportunity has also totally changed our lives financially. We are now able to provide the best education for our three young boys and totally support my 73 year old mother in her twilight years. With out Herbalife I am confident that I was headed for bankruptcy and god knows where today. You have to know that this has given me tremendous confidence and the recognition as a business leader in my community.

I have grave concerns about the proposed provisions in the FTC rule which will cause me substantial burdens in sponsoring Herbalife Distributors, by having to obtain the written disclosure statement from Herbalife. The Statement would contain, among other things, the names and contact information for 10 prior purchasers who live closest to the prospective purchaser. Obtaining this information prior to being able to move forward with any prospective distributor would create undue burden and require complicated and expensive database management which the average home based business entrepreneur like my self has neither the knowledge nor the resources to maintain. As proposed I would then have to send the disclosure statement (as signed by the prospect) to Herbalife and I would as proposed have to keep a copy or record of having done so for at least three years.

Further more I would then have to wait seven days before my prospect would be allowed to sign the Distributor Application or make any payment related to the opportunity. As an entrepreneur, I strongly support FTC's goal of preventing consumer fraud, however I think the agency needs to revisit its proposal to take into account the significant burdens it would impose on legitimate, hard-working Direct sellers as myself. Please consider my plea, as this proposal will most definitely impact our businesses in a dramatic way.

Sincerely,
Christopher Reese